

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
<i>Plaintiff</i>	)	
	)	
v.	)	Case No. 4:21-cr-00005-O-1
	)	
THE BOEING COMPANY,	)	
	)	
<i>Defendant.</i>	)	
	)	

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**RESPONSE TO LETTER OF MS. ERIN COX AND UNOPPOSED MOTION TO  
STRIKE ECF NOS. 15 AND 32 FROM THE RECORD**

Movants Naoise Connolly Ryan, Emily Chelangat Babu and Joshua Mwazo Babu, Catherine Berthet, Huguette Debets, Luca Dieci, Bayihe Demissie, Sri Hartati, Zipporah Kuria, Javier de Luis, Nadia Milleron and Michael Stumo, Chris Moore, Paul Njoroge, Yuke Meiske Pelealu, John Karanja Quindos, and Guy Daud Iskandar Zen S. (“Movants”) did not intend to allege any ethical impropriety by Ms. Nealy Cox. Having considered Ms. Nealy Cox’s Declaration, and to clarify the record, Movants now acknowledge that there is no basis upon which to allege any impropriety, ethical or otherwise, on her part and request that the Court strike both the Motion, ECF No. 15, and the Amended Motion, ECF No. 32, in their entirety. In their place, Movants have filed this day a Second Amended Motion that removes any and all statements and allegations relating in any way to Ms. Nealy Cox. ECF No. 52. Movants respectfully submit that, with these changes, no further response or briefing by Ms. Nealy Cox, Movants, the Government, or Boeing is necessary. Ms. Nealy Cox agrees.

Dated: January 20, 2022

Respectfully submitted,

/s/ Warren T. Burns

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ATTORNEYS FOR VICTIMS' FAMILIES

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Criminal Rule 47.1(b), on January 20, 2022, counsel for the Movants conferred with counsel for the United States of America, counsel for The Boeing Company, and counsel for the third-party declarant, Marianne M. Auld, Esq., via email. Counsel for the United States of America, The Boeing Company and the third-party declarant have stated they are unopposed to the relief requested.

/s/ Warren T. Burns

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Warren T. Burns

**CERTIFICATE OF SERVICE**

I certify that on January 20, 2022, the foregoing document was served on the parties to the proceedings via the Court CM/ECF filing system.

/s/ Warren T. Burns

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Warren T. Burns